

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**BRISTOW FIRST ASSEMBLY OF GOD; and  
MARK S. EVANS and CHRISTINA J. EVANS,  
Individually, and as parents and next of kin to  
C.J.E. and B.K.E., minor children,**

**Plaintiffs,**

**v.**

**Case No. 15-CV-523-TCK-FHM**

**BP p.l.c.; MARATHON OIL CORPORATION;  
MARATHON PETROLEUM CORPORATION;  
KINDER MORGAN, INC.; WENDELL SANDLIN;  
BOLIN OIL COMPANY, a Partnership, comprised of  
D.H. BOLIN, D.P. BOLIN, R.L. BOWLIN and  
C.W. BOLIN; C. W. STRADLEY; BILLY JOE  
BENNETT and PEGGY L. BENNETT; LIBERTY  
NATIONAL BANK f/k/a CHICKASHA BANK OF  
CHICKASHA; and C.P. MERCER and M. ALINE  
MERCER; their subsidiaries, heirs, estates, successors,  
executors and assigns of the named persons and entities,**

**Defendants.**

**DEFENDANT BP P.L.C.'S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD IN RESPONSE TO PLAINTIFFS' PETITION**

Defendant BP, p.l.c. ("BP") hereby moves the Court for an Order granting BP an extension of time until October 5, 2015 to answer or otherwise plead in response to Plaintiffs'

*Petition*. In support of its Motion, BP submits the following:

1. Plaintiffs, Bristow First Assembly of God, Mark S. Evans and Christina J. Evans, individually and as parents and next of kin of C.J.E. and B.K.E., filed their *Petition* in this matter on June 24, 2015.

2. Plaintiffs served BP with the *Summons* and *Petition* on August 24, 2015.

3. BP's counsel, without waiving any defense or objection, filed their *Special Entry of Appearance* simultaneously with this motion.

4. On September 14, 2015, Defendant Kinder Morgan, Inc. removed this matter to this Court.

5. Under Fed. R. Civ. P. 81, BP's pleading in response to the *Petition* is due on September 21, 2015.

6. BP requires additional time in preparing its response to Plaintiffs' *Petition*. Therefore, BP respectfully requests until October 5, 2015 to file its Answer or to otherwise plead in response to the *Petition*.

7. BP's counsel contacted counsel for Plaintiffs regarding this Motion. Plaintiffs' counsel consents to the extension of time herein requested.

8. Exclusive of Plaintiffs' *Petition*, Defendant Kinder Morgan, Inc.'s removal and *Motion to Dismiss*, there has been no activity in this case, and there are no hearings currently scheduled in this matter.

Based on the foregoing, BP respectfully requests an Order from the Court granting BP until October 5, 2015 to answer or otherwise plead in response to Plaintiffs' *Petition*.

Respectfully submitted,

**McDANIEL ACORD, PLLC**

/s/ Stacy L. Acord

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**ATTORNEYS FOR DEFENDANT BP p.l.c.**

**CERTIFICATE OF SERVICE**

I certify that on the 16<sup>th</sup> of September, 2015, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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/s/ Stacy L. Acord